

## UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States of America

v.

Xiomara MOCTEZUMA

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Case No.

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Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 31, 2019 in the county of Webb in the  
Southern District of Texas, the defendant(s) violated:*Code Section**Offense Description*

21 USC 952 &amp; 963

Did knowingly and unlawfully import, attempt to import, and conspire to import, from a place outside the United States, to wit: the United Mexican States, to a place in the United States, to wit: Laredo, Texas, approximately 25.62 kilograms of Methamphetamine, a controlled substance listed under Schedule II, of the Controlled Substance Act.

This criminal complaint is based on these facts:

See Attachment A

☒ Continued on the attached sheet./s/ Ryan Casey*Complainant's signature*Ryan Casey, HSI Special Agent*Printed name and title*

Sworn to before me and signed in my presence.

Date: 09/03/2019*Judge's signature*City and state: Laredo, TexasSam Sheldon, U.S. Magistrate Judge*Printed name and title*

**ATTACHMENT A**

I am a Special Agent of the United States Homeland Security Investigations (HSI), and have knowledge of the following facts:

1. On August 31, 2019, at approximately 12:01 PM, Xiomara MOCTEZUMA entered the United States via the Port of Entry (POE) I Gateway to the Americas in Laredo, Texas while operating a Nissan Juke bearing an Alabama license plate registered under MOCTEZUMA.
2. At the primary inspection area, MOCTEZUMA provided Customs and Border Protection Officers (CBPO) a negative oral customs declaration. MOCTEZUMA stated that she was travelling from San Luis Potosi, San Luis Potosi, Mexico. When questioned about her travel, MOCTEZUMA stated she was en route to Alabama. MOCTEZUMA was referred to secondary inspection for further inspection.
3. Once in secondary inspection, a CBP canine alerted to the presence of narcotics in the vehicle. CBP officers also conducted an X-Ray of the vehicle and discovered anomalies within all four (4) tires. CBP officers discovered 24 bundles within the tires containing a substance which field tested positive for the properties of methamphetamine. The 24 bundles weighed approximately 25.62 kilograms.
4. HSI special agents advised MOCTEZUMA of her Miranda Rights in the English language. MOCTEZUMA agreed to speak to agents without the presence of an attorney and waived her rights in writing.
5. MOCTEZUMA stated she hadn't been completely truthful and actually travelled to Morelia, Michoacan, Mexico on a Wednesday around August 18, 2019. MOCTEZUMA admitted to having knowledge that the vehicle would be loaded with something that was not supposed to be brought into the United States. MOCTEZUMA claimed no knowledge of what she was to pick up, but knew it was wrong.
6. MOCTEZUMA stated she received money for the trip and that she would be financially compensated when she returned to Mexico.
7. MOCTEZUMA was subsequently arrested and transported to the Webb County Detention Center.